

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

WAYNE RYAN,

Defendant.

Case No. 18 CR 01107 MV

**SUPPLEMENT TO RESPONSE TO GOVERNMENT’S MOTION TO
MODIFY CONDITIONS OF RELEASE (Doc. 34)**

Wayne Ryan, Defendant, by and through counsel, Alejandro Fernandez, Assistant Federal Public Defender, hereby supplements his previous response with additional documentation refuting the government’s claims.

1. The FBI report dated July 23, 2018 stated that: “RYAN called and texted K[redacted]. She forwarded RYAN’s text messages to the writer. These messages began on or around March 17, 2018, and continued until the time of the interview. *She never replied to him.*” (Emphasis added.)

2. Attached is a complete list of all text messages sent between J.K., Mr. Ryan’s ex-wife, and Mr. Ryan in the week leading up to and including March 17, 2018. On March 17, 2018 Mr. Ryan was arrested and detained.

3. In the report, entries which have +15052055924 in the field marked as “From,” are text message received from J.K. Messages with the same numeric designation in the “To” field are messages sent to J.K. David is their son.

WHEREFORE, Mr. Ryan respectfully requests that this Court deny the government’s motion to modify conditions of release.

Respectfully Submitted,
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Electronically Filed
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on August 8, 2018, I filed the foregoing electronically through the CM/ECF system, which caused AUSA George Kraehe to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

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